

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

ROY S. MOORE

Plaintiff,

v.

GUY CECIL, et al

Defendants.

Case No. 4:19-cv-01855-CLM

PLAINTIFF'S SUPPLEMENTED INITIAL DISCLOSURES

Plaintiff Roy Moore ("Plaintiff") hereby provides the following amended initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

These disclosures are based on information presently known and reasonably available to Plaintiff and which they reasonably believes it may use in this action. Plaintiff may amend these initial disclosures because of continuing investigation and discovery, and therefore reserves the right to supplement these initial disclosures.

By providing these disclosures, Plaintiff do not represent that they are identifying every document, tangible thing, or witness possibly relevant to this action. In addition, these disclosures are made without Plaintiff in any way waiving their rights to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds. Furthermore, these disclosures are not an admission by Plaintiff regarding any matter.

I. Individuals Likely to Have Discoverable Information

1. Any and all individuals listed in the Amended Complaint, notwithstanding individuals who may be discovered in discovery.

2. Roy Moore
3. Guy Cecil
4. Edward Still
5. Glynn Wilson
6. Teresa Jones
7. Johnny Adams
8. Johnnie V. Sanders
9. Brenda Fischer
10. Adam Muhlendorf
11. Chris Hayden
12. Doug Jones
13. J.B. Poersch
15. Kayla Moore
16. Caleb Moore

Plaintiff serves the right to supplement this list.

II. Documents By Description and Location

Subject to all applicable privileges, the following is a description of the relevant categories of documents, data compilations, and tangible things currently believed to be within Plaintiff's possession, custody, and control that Plaintiff may use to support their claims.

1. Any and all non-privileged documents that refer or relate to the allegations of the Amended Complaint and Defendants' defenses, including but not limited to:
 - a. All advertisements related to Roy Moore, documentation associated with the dissemination of the advertisements, media articles referencing Roy Moore,

documentation related to the creation of entitles to fund advertisements giving rise to this matter, statements made by Defendants giving rise to this matter, Defendant's social media postings related to this matter, articles referencing the material subject to this lawsuit, articles referencing the Defendants or agents of the Defendants and other digital media found regarding the intentions of the Defendants as it relates to creation of advertisements.

- b. Documentation and information in the possession of the Plaintiff and/or accessible online.
- c. Documents concerning damages to Plaintiff.
- d. The Plaintiff reserves the right to supplement.

III. Computation of Damages

1. Plaintiff's damages stem from the allegations pled in the Amended Complaint and concerning damage to financial well-being, personal and professional endeavors and reputation and emotional distress.

IV. Insurance Agreement

Plaintiff is unaware of any relevant insurance agreements.

Dated: June 22, 2021

Respectfully Submitted,

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served through the court's ECF system to all counsel of record or parties on June 22, 2021.

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